

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
 : **Case No.: 23-12723**  
**Janet Wilamowski,** : **Chapter 13**  
 : **Judge Patricia M. Mayer**  
**Debtor.** : **\*\*\*\*\***  
 :  
 :  
 : **Related Document No. 15**

**OBJECTION OF PNC BANK, NATIONAL ASSOCIATION TO  
THE CONFIRMATION OF THE PLAN (DOCKET NUMBER 15)**

PNC Bank, National Association (“Creditor”), by and through its undersigned counsel, objects to the confirmation of the currently proposed plan (“Plan”), filed by Janet Wilamowski (“Debtor”), as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor’s property commonly known as 549 Susan Dr, King of Prussia, PA 19406 (“Property”).
2. Creditor intends to file a Proof of Claim in the approximate amount of \$207,399.82. This amount includes an approximate pre-petition arrearage in the amount of \$12,333.94.
3. Debtor’s Plan does not provide for the full amount of the arrearage due on Creditor’s claim.
4. Debtor’s Plan represents an impermissible modification of Creditor’s claim and a

violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/Alyk L. Oflazian

Alyk L. Oflazian, Esquire (312912)

Adam B. Hall (323867)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Alyk L. Oflazian.

Contact email is

ALOflazian@manleydeas.com

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**CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Objection of PNC Bank, National Association to the Confirmation of the Original Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

Allen B. Dubroff, Attorney for Janet Wilamowski, allen@dubrofflawllc.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Janet Wilamowski, 549 Susan Drive, King of Prussia, PA 19406

/s/Alyk L. Oflazian